

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

§

§

**VS.**

§

**Crim No. 24-cr-0404 (3)**

§

**( Hanen, J. )**

**DEANDRE MARQUEL FIZER**

§

**JOINT AND UNOPPOSED MOTION TO CONTINUE TRIAL  
AND EXTEND DEADLINES**

TO THE HONORABLE ANDREW S. HANEN, DISTRICT COURT JUDGE:

Defendant Fizer, by and through counsel and joined in this motion by counsel for each defendant in this case, files this Joint Motion to Continue Trial and Extend Deadlines and would show:

1. On or about July 31, 2024, all ten defendants were indicted on charges alleging an extensive drug trafficking conspiracy and related charges, including various firearms violations;
2. On September 26, 2024 this Court entered an ORDER declaring the case complex [Dkt 137];
3. On January 8, a superceding indictment was filed adding numerous counts against some or all of the various defendants [Dkt 142];
4. Under the current scheduling order, motions are due March 7, 2025 and trial is set for April 7, 2025;
5. Defendants have been in negotiations with the government regarding discovery issues, including the scope and extent of a proposed protective order, which we believe can be resolved shortly and without the need for court intervention;
6. Based on discussions to date, it is believed that the discovery, once released, will

be voluminous including numerous offense reports, surveillance footage, audio and visual recordings, photographs, telephone information subpoenaed or intercepted, and other investigative material consistent with an investigation of the magnitude suggested by the charges and complexity of the case;

7. To fulfill obligations under the Sixth Amendment, counsel need additional time to resolve discovery issues and to then review the government's evidence and present that material to and consult with the clients, to conduct an independent investigation, to determine what, if any, motions should be filed; and negotiate with the government on various issues and potential resolution short of trial;

8. The Defendant respectfully requests that this Court grant a continuance for the aforementioned reasons and would show that the ends of justice would best be served by the granting of such continuance and that the granting of such continuance outweighs the best interest of the public and the Defendants to a speedy trial pursuant to Title 18 U.S.C., § 3161(h)(7)(A); and failure to grant such continuance would deny counsel for the defendants the reasonable time necessary for effective preparation pursuant to 18 U.S.C. §3161(h)(7)(B)(iv).

9. Counsel has conferred with counsel for the Government and has been advised that the government is unopposed to the relief requested;

10. Counsel has conferred via email with other defense counsel, each of which indicated they join this motion;

We respectfully request that the Court grant this motion and continue the trial in this cause for at least 120 days and extend filing deadlines accordingly and as otherwise consistent with the Court's docket.

Respectfully Submitted,

/s/ R. Trent Gaither  
R. Trent Gaither  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the counsel for the government via: X Court CM/ECF filing system and/or as indicated below.

Dated: 03/06/2025

/s R. Trent Gaither  
R. Trent Gaither

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Anhkhoa Thien Tran

United States Attorney Office

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have discussed this pleading with the AUSA of record and have been advised that the that the government has no objection to the relief requested. Counsel has also contacted counsel for each defendant in this matter, each of whom has indicated they join in the relief requested.

/s R. Trent Gaither  
R. Trent Gaither